

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

WUHAN ZHONGXIN IMPORT & EXPORT
COMPANY LTD, A Chinese Corporate
Entity,

Plaintiff,

v.

TITAN ALLIANCE IMPORT & EXPORT
CORP., A New York Corporation, and GARY
CHEUNG, a New York resident, and
HALIFAX OF PALISADE LLC, A New
Jersey Limited Liability Company licensed to
do business in New York, and JAEL SHIM
a/k/a JERRY SHIM and d/b/a HALIFAX OF
PALISADE LLC and d/b/a HALIFAX LLC
and d/b/a HALIFAX DENIM LLC, a New
Jersey resident.

Defendants.

Case No. 1:19-cv-05703-WFK-RML

NOTICE OF MOTION TO DISMISS

FIRST AMENDED COMPLAINT

ORAL ARGUMENT REQUESTED

PLEASE TAKE NOTICE that upon the accompanying Memorandum of Law, dated April 17, 2020, and all proceedings had herein, Defendants Titan Alliance Import & Export Corp. and Gary Cheung, pursuant to Federal Rules of Civil Procedure Rules 9(b) and 12(b)(6), will move this Court at the United States District Courthouse, 225 Cadman Plaza East Brooklyn, New York 11201, before the Honorable William F. Kuntz, at a date and time designated by the Court, for an Order dismissing Plaintiff's First Amended Complaint with prejudice, along with such other and further relief as the Court deems just and proper.

PLEASE TAKE FURTHER NOTICE that, pursuant to the Order of the Honorable

William F. Kuntz, dated February 21, 2020, any opposing affidavits and memoranda of law shall be served on or before May 15, 2020 at 5:00 p.m., and any reply affidavits and memoranda of law shall be served on or before May 29, 2020 at 5:00 p.m.

Dated: April 17, 2020
New York, NY

REED SMITH LLP

By: /s/ Nana Boyer
Nana Boyer
599 Lexington Avenue
New York, NY 10022
Tel.: (212) 521-5400
Fax: (212) 521-5450
nboyer@reedsmith.com

*Attorneys for Defendants
Titan Alliance Import & Export
Corp. and Gary Cheung*

TO: Kevin Kerveng Tung, Esq.
KEVIN KERVENG TUNG, P.C.
Queens Cross Business Center
136-20 38th Ave., Suite 3D
Flushing, New York 11354
Tel: (718)-939-4633

Attorneys for Plaintiffs